

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL ACTION
	)	
KARA ADAMS	)	NO. 1:10-CR-6-01-CAP (JFK)
_____	)	(FIRST SUPERCEDING)

RECONSIDERATION OF MOTION FOR CONTINUANCE OF TRIAL

COMES NOW Defendant, KARA ADAMS, by and through undersigned counsel, and respectfully submits her request for Reconsideration of Motion for Continuance of Trial in above numbered case. As grounds for this Motion, Defendant shows the following:

(1)

Ms. Adams, along with five other co-defendants, Jason James Eyer, James Adolph Schoenholz, Brittany Dunphy, Leiah Watson, and Roger Watson, are charged in a twenty-two count indictment. Specifically, she is alleged to have conspired to commit mail and wire fraud, ten substantive counts of wire fraud, ten counts of structuring, and a conspiracy to commit obstruction, in violation of 18 U.S.C. §§1341, 1343, 1349, 31 U.S.C. §5324(a)(1), 5324(a), 31 Code of Federal Regulations, Part 103, and 18 U.S.C. §371 respectively. In addition, there is a forfeiture provision.

(2)

Undersigned counsel requests that the Court reconsider the denial of her previous motion for continuance in the above-styled

case. Specifically, counsel requests that the Court consider her previous request for a leave of absence during the last week of June, that is, June 27, through July 5, 2011. Additionally, counsel is scheduled in at least two trials on May 9, 2011, and June 6, 2011. As noted previously, the instant case requires extensive document review and investigation which cannot be completed prior to July 11, 2011.

WHEREFORE, it is respectfully requested that this Court reconsider the Motion to Continue the Trial.

Dated: This 27th day of April, 2011.

Respectfully submitted,

S/Suzanne Hashimi

SUZANNE HASHIMI

STATE BAR NO. 335616

ATTORNEY FOR KARA ADAMS

Federal Defender Program, Inc.  
Suite 1500, Centennial Tower  
101 Marietta Street, N.W.  
Suite 1500  
Atlanta, Georgia 30303  
(404) 688-7530

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following Assistant United States Attorney of record:

Jamila Hall, Esq.  
Assistant United States Attorney  
600 Richard B. Russell Building  
75 Spring Street, S. W.  
Atlanta, Georgia 30335

and to counsel for all of the defendants:

Lawrence J. Zimmerman  
Law Offices of Lawrence Zimmerman  
Suite 300  
1800 Peachtree Street  
Atlanta, Georgia 30309

W. Sander Callahan  
Callahan Law P.C.  
P.O. Box 4327  
Atlanta, Georgia 30302

Stanley M. Baum  
Bates and Baum  
3151 Maple Drive, N.E.  
Atlanta, Georgia 30305

Jay Lester Strongwater  
Strongwater & Associates, LLC  
Suite 1250, Two Midtown Plaza  
1349 West Peachtree Street  
Atlanta, Georgia 30309

Steven Paul Berne  
Law Offices of Steven Berne  
Suite 1250  
1349 West Peachtree Street  
Atlanta, Georgia 30309

Dated: This 27th of April, 2011.

S/SUZANNE HASHIMI  
SUZANNE HASHIMI  
STATE BAR NO. 335616  
ATTORNEY FOR KARA ADAMS